

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

**IN RE
PHARMASTEM THERAPEUTICS,
INC., PATENT LITIGATION**

Civil Action No. 05-md-01660-GMS

**QUINN EMANUEL URQUHART OLIVER & HEDGES, LLP'S
MOTION TO WITHDRAW**

Samuel B. Shepherd (CA Bar No. 163564)
Quinn Emanuel Urquhart Oliver & Hedges, LLP
555 Twin Dolphin Drive, Suite 560
Redwood Shores, California 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100
samshepherd@quinnemanuel.com
Attorneys for Stembanc, Inc. & Archibald A. Grabinski

Dated: April 19, 2005

Quinn Emanuel Urquhart Oliver & Hedges, LLP ("Quinn Emanuel"), pursuant to Local Rule 83.7, will and hereby does move the Court, located at 844 North King Street, Wilmington, Delaware 19801, before the Honorable Gregory M. Sleet, for an order relieving it as counsel of counterdefendants Stembanc, Inc. ("Stembanc") and Archibald A. Grabinski ("Mr. Grabinski") in this action. Good cause exists to grant this motion. Stembanc and Mr. Grabinski have failed to pay for all of the legal work performed by Quinn Emanuel on their behalf.

This motion is based on the accompanying Memorandum of Points and Authorities in support thereof, the declaration of Samuel B. Shepherd dated March 17, 2005, the declaration of Kimberly L. Busch dated March 24, 2005, the records on file in this action, any matters of which this Court may take judicial notice, and any evidence that may be presented at the hearing on this motion.

Respectfully Submitted,
QUINN EMANUEL URQUHART
OLIVER & HEDGES, LLP

By: 

Samuel B. Shepherd (CA Bar No. 163564)
555 Twin Dolphin Drive, Suite 560
Redwood Shores, California 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100
samshepherd@quinnemanuel.com
Attorneys for Stembanc, Inc. & Archibald A. Grabinski

Dated: April 19, 2005